SHAWN A. MANGANO, ESO. Nevada Bar No. 6730 2 shawn@manganolaw.com SHAWN A. MANGANO, LTD. 9960 West Chevenne Avenue, Suite 170 3 Las Vegas, Nevada 89129-7701 Tel: (702) 304-04732 4 Fax: (702) 922-3851 5 6 Attorney for Righthaven LLC 7 UNITED STATES DISTRICT COURT 8 DISTRICT OF NEVADA 9 RIGHTHAVEN LLC, a Nevada limited-Case No.: 2:10-cv-01343-RLH-PAL 10 liability company, Plaintiff, 11 STIPULATION AND ORDER FOR **EXTENSION OF TIME FOR** v. RIGHTHAVEN LCC TO FILE 12 RESPONSE TO DEFENDANT AND THOMAS A. DIBIASE, an individual, 13 COUNTERCLAIMANT'S MOTION TO COMPEL THE PRODUCTION OF **DOCUMENTS** 14 Defendant. 15 (First Request) 16 17 THOMAS A. DIBIASE, an individual, 18 Counterclaimant, 19 v. 20 RIGHTHAVEN LLC, a Nevada limitedliability company, 21 Counterdefendant. 22 23 24 IT IS HEREBY STIPULATED BETWEEN Plaintiff/Counterdefendant, Righthaven LLC 25 ("Righthaven"), through its attorney of record, and Defendant/Counterclaimant Thomas A. 26 DiBiase ("Mr. DiBiase"), through his attorneys of record, that Righthaven's Response to Mr. 27 DiBiase's Motion to Compel (Doc. #53) shall be due on or before June 9, 2011. In view of this 28

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extension of time, the deadline for Mr. DiBiase to file his reply shall be calculated using the date 1 Righthaven files its response. 2 This stipulation for extension of time is being granted to accommodate Righthaven's 3 counsel's schedule. This stipulation is sought in good faith and not for purposes of delay. 4 5 DATED: June 6, 2011 6 WILSON SONSINI GOODRICH & ROSATI SHAWN A. MANGANO, LTD. 7 8 By: /s/ Shawn A. Mangano 9 /s/ Bart E. Volkmer Shawn A. Mangano, Esq. By: Colleen Bal, Esq. 9960 West Cheyenne Avenue 10 Bart E. Volkmer, Esq. Suite 170 11 650 Page Mill Road Las Vegas, Nevada 89129 Palo Alto, California 94304-1050 12 Attorney for Plaintiff and Counter-Defendant Righthaven LLC THE ELECTRONIC FRONTIER 13 **FOUNDATION** 14 Kurt Opsahl, Esq. Corynne McSherry, Esq. 15 454 Shotwell Street San Francisco, California 94110 16 17 CHAD A. BOWERS, LTD. Chad A. Bowers, Esq. 18 3202 West Charleston Boulevard Las Vegas, Nevada 89102 19 20 Attorneys for Defendant and Counterclaimant Thomas A. DiBiase 21 22 23 IT IS SO ORDERED: 24 25 UNITED STATES MAGISTRATE JUDGE 26 27 **DATED:** June 9, 2011 28